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Attorney for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

BRETT WAGGONER, an Individual

Plaintiff,

vs.

NYE COUNTY; CHRIS ARABIA, in his
individual and official capacity; LEO
BLUNDO, in his individual and official
capacity; DOES I -X; ROE CORPORATIONS
I -X,

Defendants.

CASE NO. 2:21-cv-01312-APG-EJY

STIPULATION AND ORDER TO EXTEND
DATE TO FILE PRETRIAL ORDER

(First Request)

COME NOW, Plaintiff BRETT WAGGONER (“Plaintiff”), named above, by and through
his counsel of record, MICHAEL P. BALABAN, ESQ. and Defendants CHRIS ARABIA and
LEO BLUNDO (“Defendants Arabia and Blundo”), named above, by and through their counsel of
record, BRIAN HARDY, ESQ. pursuant to LR IA 6-1 and LR 26-4, herein stipulate, agree and
make joint application to extend the date to file the joint pretrial order date for a period of sixty
(60) days. The present pretrial order due date is on September 7, 2023 and the requested extension

1 would make the pretrial order due on Monday November 6, 2023. No calendar call date or trial
2 date has been set.

3 This stipulation is made and based upon the following factors.

4 Counsel for Plaintiff has been busy working on other cases and in particular getting an
5 appellate brief prepared and filed in another case. In addition Defendants Arabia and Blundo just
6 filed a motion for reconsideration of the Court's order denying in part their motion for summary
7 judgment which won't even be briefed for approximately one month.

8 This request for an extension is not for purposes of delay; rather it is sought merely to
9 provide the parties sufficient time to get the joint pretrial order prepared and filed given their
10 counsels schedules and the recent filing discussed above.

11 LAW OFFICES OF MICHAEL P.
12 BALABAN

MARQUIS AURBACH COFFING

13 /s/ Michael P. Balaban

/s/ Brian R. Hardy

14 Michael P. Balaban, Esq.
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16 Las Vegas, NV 89141
Attorney for Plaintiff

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10001 Park Run Drive
Las Vegas, NV 89145
*Attorneys for Defendants Chris
Arabia and Leo Blundo*

17 Dated: September 6, 2023

Dated: September 6, 2023

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20 IT IS SO ORDERED; provided, however, no
21 additional extensions will be granted absent
22 extraordinary unforeseen circumstances.

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24
25 U.S. MAGISTRATE JUDGE

26 Dated: September 7, 2023
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